

Exhibit A

From: [Adam Slater](#)
To: [Goldberg, Seth A.](#); [Priselac, Jessica](#); [Schwartz, Barbara](#)
Cc: [Layne Hilton](#); [George T. Williamson](#); [Christopher Geddis](#)
Subject: ZHP depositions
Date: Tuesday, January 12, 2021 11:42:04 PM

Dear Counsel:

I am writing in follow up to our conference call on January 12, 2021 regarding the depositions of the ZHP witnesses.

For the reasons expressed during our multiple calls, we cannot agree to a lump sum of time to allocate between and among the depositions, as this would be enormously complex and create significant difficulty and otherwise unnecessary coordination in an effort to preserve time across depositions conducted by various attorneys across more than two months of depositions addressing varied topics. However, in the interest of reaching agreement we are willing to modify the proposed deposition lengths (with exceptions as noted) for the 30 b 6 witnesses as follows. Please note that this is predicated on our ability to use the fact deposition time as necessary to complete the 30 b 6 part of the deposition, without an artificial cap or limit on our ability to do so.

Lijie Wang:

We believe that our initial proposal of 1.5 days (3.5 hours for 30 b 6), is more than reasonable, and note that in our meet and confer you suggested 2.5 hours of 30 b 6 time so we are virtually in agreement.

Hai Wang:

This witness has 19 topics and we believe that 2.5 days total is reasonable.

Linda Lin:

We believe that our initial proposal of 2 days is reasonable, however we will agree to shorten the 30 b 6 deposition by 2 hours, for a total length of 1 day plus 5 hours.

Jie Wang:

We believe that our initial proposal of 2 days is reasonable in light of the number and nature of the 8 topics assigned to this witness.

Eric Gu:

We believe that our initial proposal of 2 days is reasonable, however we will agree to shorten the 30 b 6 deposition by 2 hours, for a total length of 1 day plus 5 hours.

Jucaí Ge:

We believe that our initial proposal of 3 days is reasonable, especially in light of the 12 topics assigned to this witness, however we will agree to shorten the 30 b 6 deposition by 2 hours, for a total length of 2 days plus 5 hours.

Minli Zhang:

We believe that our initial proposal of 3 days is reasonable, especially in light of the 20 topics assigned to this witness, however we will agree to shorten the 30 b 6 deposition by 2 hours, for a total length of 2 days plus 5 hours.

Qiangming Li:

We believe that our initial proposal of 2.5 days is reasonable, especially in light of the 9 topics assigned to this witness, however we will agree to reduce the total time by 1.5 hours, for a total length of 2 days plus 2 hours.

Peng Dong:

We believe that our initial proposal of 2.5 days is reasonable, especially in light of the nature of the 5 topics assigned to this witness, however we will agree to reduce the total time by 1.5 hours, for a total length of 2 days plus 2 hours.

Min Li:

We believe that our initial proposal of 2.5 days is reasonable, especially in light of the nature of the 4 topics assigned to this witness, however we will agree to reduce the total time by 1.5 hours, for a total length of 2 days plus 2 hours.

We believe that this modified proposal is more than reasonable. We still hope that you will meet and confer with us in good faith in advance of the depositions in an effort to narrow the necessary questioning, for example in identifying the determinative quantitative documents on the sales and pricing, the market contamination, operative SOP's and cGMP's, and foundational information found in the testing documents, which should help us to move more efficiently through the depositions. As we told you during our call, if a deposition can reasonably be finished in less than the allotted time, based on how the deposition proceeds, we will do so.

Please advise.

Adam M. Slater

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